REMARKS/ARGUMENTS

Please note that a Request for Continued Examination ("RCE") and the appropriate fee have been filed with this Amendment/Reply.

Claims 17 and 37 stand rejected under 35 U.S.C. 112, first paragraph, for failing to comply with the enablement requirement. The Examiner does not see how the expression "presentation definition identification" used in Claims 17 and 37 is equivalent to the term "locator" which was used previously. In addition, with respect to the expression "wherein the customer attributes are name-value pairs" in Claim 37, the Examiner says that he could not find support for this limitation in the specification. In response, the Applicant respectfully submits that the subject matter of Claims 17 and 37 is fully supported by the Applicant's specification. The Examiner to respectfully directed to paragraph 0064 (in particular, page 18, line 27 to page 19, line 14) of the specification as filed where the equivalency between the expression "presentation definition identification" and "locator" is apparent. This same selection from the specification as filed provides support for the expression "wherein the customer attributes are name-value pairs" in Claim 37. In particular, the selection provides examples of name-value pairs such as "Age=25" and "Sex=M".

Claim 34 stands rejected under 35 U.S.C. 112, second paragraph, as being indefinite in that the expression "means for communications" makes the Examiner unsure what or who communicates in this instance. In response, the expression "means for communications" has been deleted from amended Claim 34.

Claims 17-23, 25-28, 30-34, 36-38, and 41-48 stand rejected under 35 U.S.C. 103(a) as being unpatentable over United States Patent No. 6,240,411 to Thearling ("Thearling") in view of United States Patent Application Publication No. 2002/0174182 by Wilkinson, et al. ("Wilkinson"). In addition, Claim 39 stands rejected under 35 U.S.C. 103(a) as being unpatentable over Thearling in view of Wilkinson and further in view of United States Patent No. 6,236,978 to Tuzhilin ("Tuzhilin"). Furthermore, Claim 40 stands rejected under 35 U.S.C. 103(a) as being unpatentable over Thearling in view of Wilkinson and further in view of United States Patent Application Publication No. 2001/0037346 by Johnson ("Johnson").

The Applicant notes that the Thearling, Tuzhilin, and Johnson references are new references not cited by the Examiner in the first or second Office Actions. The Wilkinson reference was cited by the Examiner in the first and second Office Actions. United States Patent No. 6,636,860 to Vishnubhotla ("Vishnubhotla") which was cited in the second Office Action has not been cited by the Examiner in the present Office Action.

Claims 17 and 34 have been amended with a view to better defining the invention. Claim 34 has been amended as noted above. No new matter has been entered by these amendments. The Applicant respectfully submits that the subject matter of amended Claim 17 and previously presented Claim 37 (and the claims depending therefrom, respectively) is not taught or suggested by Thearling or Wilkinson, either alone or in combination. Consequently, the Examiner is respectfully requested to consider the amended and previously presented claims in view of the following comments.

For reference, amended Claim 17 recites the following:

> 17. (Currently Amended) A data mining system for delivering presentations associated with data mining models, said data mining system comprising:
> > a repository to store said data mining models, customer attributes, and presentation definitions;
> > means to edit said data mining models, said presentation definitions, and said customer attributes;
> > means to generate a presentation to deliver to a customer system; wherein said means to generate includes an analytic decision engine system including model presentation services and scoring services modules; and,
> > means to receive inputs from said customer system and to deliver said presentation to said customer system;
> > wherein said inputs include a customer identification and a presentation definition identification;
> > wherein said means to generate selects a presentation definition using said presentation definition identification and selects a customer attribute using said customer identification;

wherein said presentation definition includes a reference to a data mining model <u>and</u> <u>one or more rules</u>;

and,

wherein said means to generate applies said data mining model <u>and said one or more</u> <u>rules</u> to said customer attribute to produce an outcome for display in said presentation according to a format included in said presentation definition.

On pages 4-6 of the Office Action, the Examiner cites Thearling and Wilkinson against previous Claim 17 stating:

"As per claim 17 Thearling is directed to a data mining system for delivering presentations associated with data mining models, said data mining system comprising:...a repository to store said data mining models, customer attributes, and presentation definitions (fig. 3, #30);... means to edit said data mining models, said presentation definitions, and said customer attributes (column 2, lines 54-61; column 9, lines 60-67; column 10, lines 1-7; column 11, lines 12-14);...means to generate a presentation to deliver to a customer system; wherein said means to generate includes an analytic decision engine system including model presentation services and scoring services modules (figure 10b, #100; column 9, lines 60-67; column 10, lines 1-7); and,...means to receive inputs from said customer system and to deliver said presentation to said customer system (column 5, lines 1-7);...wherein said means to generate selects a presentation definition using said presentation definition identification and selects a customer attribute using said customer identification; wherein said presentation definition includes a reference to a data mining model (column 8, lines 34-43); and,...Thearling does not teach wherein said inputs include a customer identification and a presentation definition identification...Wilkinson et al. teaches wherein said inputs include a customer identification and a presentation definition identification (Wilkinson et al., paragraph 0032, second column, lines 6-8; paragraph 0037, second column, lines 10-11)...It would have been obvious to one of ordinary skill in the art at the time the invention was made to combine the Thearling by teachings of Wilkinson et al. to include wherein said inputs include a customer identification and a presentation definition identification because recording user information is well known in the art...Thearling does not teach wherein said

means to generate applies said data mining model to said customer attribute to produce an outcome for display in said presentation according to a format included in said presentation definition...Wilkinson et al. teaches wherein said means to generate applies said data mining model to said customer attribute to produce an outcome for display in said presentation according to a format included in said presentation definition (Wilkinson et al., paragraph 0036, lines 24-29; paragraph 0039, lines 5-8; paragraph 0045, lines 10-11)...It would have been obvious to one of ordinary skill in the art at the time the invention was made to combine the Thearling by teachings of Wilkinson et al., to include said means to generate applies said data mining model to said customer attribute to produce an outcome for display in said presentation according to a format included in said presentation definition because using formatting makes reading of the results easier and more efficient (Wilkinson et al., paragraph 0025)."

For reference, the selections from Thearling cited by the Examiner above recite the following (context and underlining added by the Applicant):

"FIG. 2 illustrates an example of application of a model to a database **20**. The model **26** is fed to a model engine **22**. For example, the model **26** may be an executable file that can be applied by the model engine **22**. The model engine **22** takes as an input a database **20**. The database **20** may be a database such as that shown at **15**, but including only columns **17a-17c**...The model engine **22** may then apply the model to each record in the database **20** to produce a modified database **24**. This modified database **24** would include the results of application of the model **26** to the database **20**. Thus, the modified database **24** could be a table that includes an extra field (or column) that specifies the results of application of the model (or a separate table storing a key and a score, which can be joined with other tables). For example, in table **33** of FIG. 3, application of the model **26** could have resulted in a score, which is added to the table **33** in the last column **32d**. Each record (e.g. **31b-31e**) receives a corresponding calculated model value (e.g. rows **31b-31e** in column **32d**)." (Col. 2, lines 47-65.)

"<u>FIG. 5 illustrates one graphical interface for constructing a query.</u> This interface is available in the VALEX.upsilon.program sold by Exchange Applications of Boston, Mass...The screen **50** may be displayed on the screen of a general personal computer, or any other computer. The screen may include a set of fields **51**, such as available in conventional software programs. For example, there may be a file field, an edit field, a view field, an options field, a tools field and a help field...Some or all of the possible commands that can be entered may also have push button interfaces **52**. Thus, a new document could be opened or the existing query saved by pressing an applicable button on the tool bar **52**." (Col. 4, line 63 to col. 5, line 8.)

"FIG. 6 illustrates one embodiment of a method for dynamically resolving model values during campaign management. At a step **60**, the model is prepared. This preparation process can proceed according to known techniques. For example, the preparation of the model can be performed by the SAS Enterprise Miner (or other SAS statistical model tools such as SAS/STAT), referred to above. This program permits development of models for scoring a database based on a variety of paradigms, such as a neural-network paradigm, a statistical paradigm, or decision tree. Similarly, other programs such as those described above with reference to FIG. 1B can be used for preparing the model...<u>At a step **62**, the model is added to a model library. This step may correspond to storing whatever parameters are necessary to regenerate and run the model against one or more records in a database. For example, the model could be a segment of executable code that, when executed against a record, generates a score. As just one other example, the model could be a set of values for coefficients of an equation which generates a score when applied to a record in a database... At a step **64**, a selection criteria is built that includes a model reference. In one embodiment, the selection criteria is a query containing a model reference.</u> Building a query may proceed as known in the art for regular field values, with the exception that a model reference is used in place of a field. Thus, for example, a Boolean and/or decision tree can be built for a query with the leaves of the tree including not only field comparisons with other fields or values, but also a comparison of model scores with other fields, model scores or values. <u>The model reference may be any mechanism for using, evaluating or accessing the model, including code for the</u>

<u>model, pointers (to code or some other information), model parameters, or any other way to</u> <u>allow evaluation of the model.</u>" (Col. 8, lines 12-47.)

"FIG. 7 illustrates one embodiment of a system for performing the method illustrated in FIG. 6. In this embodiment, a data mining system **70** generates a model **72**. This generation of models may be done as described above, including with reference to FIG. 1. As described above, the data mining engine can be a software program or package executed on a general purpose or personal computer...The model **72** is passed to a campaign manager **76**. This may be implemented using a simple software interface, allowing the user to <u>select a model</u> <u>(through a model reference) and build a model record **74**, as described below.</u> OLE or other mechanisms can be used to automate building the model library **78**. The campaign manager **76** may be a separate software module resident on the same computer as the data mining system **70**...<u>The campaign manager **76** may then retain the model in a model library **78**. The</u> <u>model library **78** may be a database or data structure storing the models available to the</u> <u>campaign manager. In one embodiment, the models may be stored as data records, e.g.,</u> <u>record **74**. Such a record could include a variety of fields.</u> For example, a name field **75a** could store a value corresponding to a name of the model (here, 'X'). A comment field **75b** could be included. Thus, the creator of the model (or any other person) could add comments about the model, for example comments about the meaning of scores for the model. Thus, if a model generates scores in a range from zero to one, the creator of the model might indicate that scores above 0.8 indicate a high likelihood that a customer will provide repeat business. A creator field **75c** might record information about the creator or the software (e.g. data mining system **70**) that was used to create the model. Similarly, a date field **75d** might record the date the model was created. Other fields may be useful, such as a field in the data record **74** specifying which characteristics of the database (i.e., which fields within a record) are used by the model to generate a score...A model field **75e** may also be included. This field may provide a mechanism for the campaign manager **76** to use the model to score a record in a database table. This field may include executable code. The executable code could be executed, for example, by the campaign manager **76** or passed by the campaign manager **76** to the data mining engine **74** for evaluation by the data mining system **70**. The model field **75e** might, in the alternative, provide a pointer to a separate area of storage within the model

library **78**, or to storage associated with the data mining system **70**, that includes information necessary to use the model to score database records. That information might be an executable file or parameters for use in conjunction with an executable file that informs the model how to evaluate the score (such as coefficients for an equation)." (Col. 9, line 23 to col. 10, line 7.)

"<u>FIG. 8 illustrates a tool that may be used for allowing a user to specify a model for use in</u> <u>building a query. In one embodiment, inputting of models for the queries can be done in a</u> <u>manner similar to the way that fields are specified for a table--the only difference being that</u> <u>a reference to a model is made rather than just the field</u>...The tool illustrated in FIG. 8 also includes a value field **86**. The value field would permit a user to input the appropriate value for comparison with the model score...Of course many other features could be incorporated into the interface. As one example, a field could be added that shows the current portion of the query being constructed (e.g., model 'X' greater than 0.8). Similarly, interface buttons may be included that allow a user to check the syntax of the current query (for example, if the user inputs an incorrect value in the value portion of the screen **86**, such as inputting a character string when the output of the model is a numerical score.) <u>Other features could be</u> <u>implemented, for example, viewing (or editing) of a model could be permitted</u>...In one embodiment of the present invention, the model is run against the database not only as a part of the campaign management process, but also the campaign management process is used to restrict the number of records that are evaluated by the model. (In some embodiments, the user may be permitted to (a) specify whether all models are run against the entire database, (b) specify that only identified models are run against restricted databases or (c) specify that all models should be run against restricted databases.)" (Col. 10, line 21 to col. 11, line 22.)

For reference, the selections from Wilkinson cited by the Examiner above recite the following (underlining added by the Applicant):

"**[0025]** In one embodiment of the present invention, an interaction motivation plan includes multiple constituent interaction motivation plans. In one exemplary implementation, the overall interaction motivation plan selects a constituent interaction motivation plan in

accordance with rules or guidelines similar to selection of an action above. For example, a constituent interaction motivation plan needs to be activated to further select the action to be presented to a target. This hierarchy of motivation plans permits multiple interaction motivation plans to be considered when it is not clear which one is 'best' (e.g., facilitates maximized achievement of campaign objectives within campaign restrictions). The multiple interaction plans are tested and optimized similar to testing and optimization of individual actions."

"[0032] The component modules of real time electronic service interaction management system **100** cooperatively operate to facilitate development of an interaction motivation plan and creation of <u>information presentation instructions</u> in accordance with the interaction motivation plan. <u>Database module **110** receives and stores information associated with target interaction (e.g., information about customers such as descriptive and behavioral characteristics and their interactions with real time electronic service interaction management system **100**), relevant system state and external state information, as well as information associated with the state of a touch-point (a point of interaction with the system). Data mining module **120** analyzes information utilized to predict and describe target interaction behavior (e.g., through techniques such as segmentation, clustering, affinity analysis, etc.).</u> Testing module **130** creates an interaction motivation test plan. In one exemplary implementation, the interaction motivation test plan is directed at automatically learning about target (e.g., customer) interactions based upon a particular touch-point state (e.g. with particular information presentations). The interaction motivation test plan is also directed at testing (e.g., validating and enhancing) the analysis of information by data mining module **120**. Optimization module **140** creates optimizing inputs to an interaction motivation plan. In one exemplary implementation of the present invention, the optimizing inputs are directed to increasing user interactions with respect to the specified objectives (e.g., from a system manager) while meeting predetermined constraints (e.g., also specified by the system manager). Plan merging module **150** combines the test inputs and optimization inputs into one <u>interaction motivation plan. Target (e.g., customer) interaction module **170** provides instructions to a 'touch point' (e.g., website, call center, email, phone system, a graphical user interface, etc.) for presenting information in accordance with an interaction motivation</u>

plan. In one embodiment of the present invention, target interaction module **170** also records customer responses and behavior. Management interface module **190** facilitates communication of information to and from campaign sponsors (e.g., campaign managers)."

"**[0036]** In one exemplary implementation of the present invention, information is processed through real time electronic service interaction management system **100** and an interaction motivation plan is developed. Referring still to FIG. 1, relevant historical data 'A' (e.g., customer profiles, customer transactions, product information, information on previous interactions, information on promotions, etc.) is transferred to mining module **120**. The data mining results 'B' are fed into testing module **130** (e.g., quantitative data describing customer behavior, candidate interactions, segmentation, etc.). In one exemplary implementation, real time target interaction data 'C' (e.g., current customer activity) is also sent to testing module **130**. Interaction motivation test plans 'D1' and behavior model 'D2' are transferred to optimization module **140**. Optimization module **140** provides feedback 'E' to testing module **130** on which parameters require further testing to increase confidence in an optimized solution (e.g., an optimized interaction motivation plan). Inputs 'F' from testing module **130** (e.g., an interaction motivation test plan) and optimization module **140** (e.g., an optimized interaction motivation plan) are transferred to merging module **150** and merged into an interaction motivation plan. The merged interaction motivation plan 'G' is transferred to interaction module **170** which creates information presentation instructions in accordance with the merged interaction motivation plan. Information associated with target (e.g., customer) interaction 'H' is recorded in a real time response database **115** and archived into historical database **117**. In one exemplary implementation of the present invention, system management module **190** operates as an interface that facilitates communication of information 'I' 'J' and 'K' (e.g., campaign objectives and constraints) to and from a manager."

"**[0037]** In one embodiment of the present invention, customer interaction module **170** receives target interaction information and provides presentation information and instructions in accordance with an interaction motivation plan. In one embodiment of the present invention, customer interaction module **170** includes a graphical user interface that

displays stimulation information in accordance with an interaction motivation plan (e.g., a product or service offer plan). In one embodiment of the present invention, customer interaction module 170 also records which stimulation action (e.g., offer action) was made and customer response actions including the customer identification and system state when the response action occurred. In one exemplary implementation of the present invention, customer interaction module 170 records customer actions and states that, although not relevant to the current interaction motivation plan (e.g., offer plan), are a part of the customer behavior model."

"[0039] In one embodiment of the present invention, the target interaction module presents information (e.g., an offer or promotional material) to a target according to the procedure defined by the interaction motivation plan. In one exemplary implementation of the present invention, an interaction motivation plan includes a set of instructions that are interpreted and utilized by target interaction module 170 to develop a stimulation action (e.g., an information presentation)."

"[0045] The components of computer system 200 cooperatively function to provide a variety of functions, including alignment directions. Address/data bus 210 communicates information, central processor 201 processes information and instructions, volatile memory 202 (e.g., random access memory RAM) stores information and instructions for the central processor 201 and non-volatile memory 203 (e.g., read only memory ROM) stores static information and instructions. Optional removable data storage device 204 (e.g., CD) also stores information and instructions. Display module 205 displays information to the computer user. Alphanumeric input device 206 and cursor directing device 207 communicate user input information and command selections to the central processor 201. Signal Communication port 208 is a communication interface (e.g., a serial communications port) for communicating signals to and from coupled peripheral devices."

Also, please consider the following additional selection from Wilkinson (underlining added by the Applicant):

"**[0009]** The present invention is a system and method that facilitates expedient and efficient presentation of information in a manner that increases the probability of target individual interaction. The present invention system and method is able to monitor user interactions, optimize interaction motivation plans and test interaction motivation plans. In one embodiment of the present invention, a real time electronic service interaction management system and method is utilized to assist development and implementation of electronic commerce (e-commerce) campaign activities. For example, the present invention is utilized to assist electronic marketing optimization (e-MO) by automated management of promotional campaigns in conjunction with an e-commerce site. A present invention real time electronic service interaction management system and method monitors the interactions (e.g., purchasing behavior) of target individuals (e.g., customers) and has the ability to assist development of an interaction motivation plan. An interaction motivation test plan sets guidelines and rules for information presentation to a target audience. The present invention system and method also has the ability to develop interaction motivation test plans for learning about target individual interaction activities and accordingly modify interaction motivation plans (e.g., change decision rules) in both real time and over the lifetime of a campaign."

"**[0021]** The present invention facilitates development of an interaction motivation plan designed to evoke and stimulate target interaction. In one embodiment of the present invention, a real time electronic service interaction management system and method is utilized to aid development of electronic commerce (e-commerce) presentations that are provided to a target (e.g., a customer). For example, the present invention is utilized to assist electronic marketing optimization (e-MO) by automated management of promotional campaigns associated with an e-commerce site. The interaction motivation plan sets guidelines or rules that determine the presentation of information to a target individual (e.g., a customer) as part of an interaction campaign (e.g., an e-commerce marketing campaign). In one embodiment of the present invention, the interaction motivation plan includes guidelines for presenting information in accordance with customer segmentation definitions, promotion definitions, campaign objectives and campaign constraints. A present invention real time electronic service interaction management system and method monitors the interactions (e.g.,

purchasing behavior) of targets (e.g., customers) and has the ability to continually modify interaction motivation plans (e.g., change information presentation rules and guidelines) in both real time and over the lifetime of an interaction motivation campaign."

"[0022] Information is presented to a target and the target is permitted to interact with the system. The target is an external object and has an associated set of target attributes or characteristics that include demographic characteristics that describe the target (e.g., age, income, etc.) and behavioral attributes (e.g., number of purchases from a company within a specific time period, click through events to links within a web site, recency and frequency of visits to a store or website, etc.). In one embodiment of the present invention a target has an associated subset of attributes or characteristics that uniquely identify the target (e.g., social security number, identification number, etc.). The present invention is readily adaptable to accommodate interactions from a variety of targets (e.g., a person, an audience, an organization, a business, another system, an electronic device, etc.). In one exemplary implementation of the present invention, a target is a customer accessing information from the system through a touch-point (e.g., an e-commerce site)."

"[0023] In one embodiment of the present invention, information presented to a target is part of a stimulation action. A stimulation action presents information intended to motivate the target to interact with the system. Each stimulation action has an associated set of stimulation attributes or characteristics (e.g., a specific monetary discount amount, a percentage reduction, a formal or informal presentation style, etc.). In one embodiment of the present invention, a stimulation action has an associated subset of attributes or characteristics that uniquely identify the stimulation action. In one exemplary e-commerce implementation of the present invention a stimulation action includes an offer action (e.g., an offer or advertisement to purchase a good or service at a particular price)."

"[0024] The present invention system and methods utilize an interaction motivation plan to determine what stimulation action if any is presented to a target and when to present it. In one exemplary implementation a motivation interaction plan is a procedure utilized to figure out for given system characteristics what stimulation action to present to a target with certain

attributes. In one exemplary implementation, an interaction motivation plan is represented by logical rules based on customer and system attributes, by probability distributions of actions to be performed on certain kinds of customers, or by a process of conditional instructions. An exemplary customer and system attribute rule includes if a customer is younger than 30 and the total number of performances of actions is less than 20 then perform a first action. An exemplary based upon probability distributions of actions to be performed on certain kinds of customers includes for all customers younger than 50 present 20% with a first action and 80% with a second action. An exemplary process of conditional instruction rule includes if a customer older than 20 then present a first action and if it triggers a desired interaction then present a second action (e.g., the second action is possibly presented immediately after the first action in real time), if not then present a third action. In one embodiment of the present invention, the interaction motivation plan includes interation (e.g., present offer x until condition y)."

First, the selections from Thearling cited by the Examiner do not teach "presentation definitions" as recited in amended Claim 17. In addition, Thearling does not teach "means to edit...said presentation definitions..." as recited in amended Claim 17. Furthermore, Thearling does not teach "a repository to store said...presentation definitions" as recited in amended Claim 17. All Thearling teaches at col. 2, lines 54-61, col. 9, lines 60-67, col. 10, lines 1-7, and col. 11, lines 12-14 is the storing and editing of models. Models are not the same as presentation definitions. Models are used for generating scores. In contrast, a presentation definition as recited in amended Claim 17 is for defining the content (i.e., an outcome) and format of a presentation.

Second, the selections from Thearling cited by the Examiner do not teach "means to generate a presentation" as recited in amended Claim 17. All Thearling teaches at col. 9, lines 60-67 and col. 10, lines 1-7 is the storing and editing of models. The storing and editing of models does not produce a presentation. A model is used for generating a score. In contrast, a presentation as recited in amended Claim 17 is used for displaying an outcome (e.g., a recommended action or suggested product offering).

Third, the selections from Thearling cited by the Examiner do not teach "means to…deliver said presentation to said customer system" as recited in amended Claim 17. All Thearling teaches at col. 5, lines 1-7 is a graphical user interface for constructing a query. Such a graphical user interface may not be used to deliver a presentation to an external customer system.

Fourth, the selections from Thearling cited by the Examiner do not teach "wherein said means to generate selects a presentation definition using said presentation definition identification…" as recited in amended Claim 17. All Thearling teaches at col. 8, lines 34-43 is the storing of a model in a model library. A model is not the same as a presentation definition. A model is used for generating a score. In contrast, a presentation definition as recited in amended Claim 17 is for defining the content (i.e., an outcome) and format of a presentation.

Fifth, the selections from Thearling cited by the Examiner do not teach "wherein said presentation definition includes a reference to a data mining model and one or more rules" as recited in amended Claim 17. All Thearling teaches at col. 8, lines 34-43 is a query including a model reference. A query is not the same as a presentation definition. A query is used to select one or more records from a database. In contrast, a presentation definition as recited in amended Claim 17 is used to define the content (i.e., an outcome) and format for a presentation using a reference to the data mining model and one or more rules.

Sixth, in the "Response to Arguments" section on page 15 of the Office Action the Examiner states:

> "Applicant's arguments with respect to claims 17-23, 25-28, 30-34 and 36-48 have been considered but are moot in view of the new ground(s) of rejection…As per applicants argument that Wilkinson et al. does not teach location is not found persuasive. In paragraph 0032 Wilkinson et al. teaches the instruction to a 'touch point' which would be takes as location."

With respect to the Examiner's statements above, it would appear that the Examiner is referring to the presentation "locator" now referred to as "presentation definition identification" in amended Claim 17. The "touch-point" in paragraph 0032 of Wilkinson does not relate in any way to a

presentation definition identification. (Note that paragraph 0032 of Wilkinson is reproduced above.) Rather, paragraph 0032 defines "touch-point" as "a point of interaction with the system". The paragraph further includes the following: "'touch point' (e.g., website, call center, email, phone system, a graphical user interface, etc.) for presenting information in accordance with an interaction motivation plan". Thus, it is apparent that the term "touch-point" in Wilkinson is not the same as the "presentation definition identification" recited in amended Claim 17. A "touch-point" is simply a point of interaction with the system such as a graphical user interface. It is not a reference to or identification of a presentation definition as recited in amended Claim 17.

Seventh, the selections from Wilkinson cited by the Examiner do not teach a "presentation definition identification" as recited in amended Claim 17. All that paragraphs 0032 and 0037 of Wilkinson teach are "information presentation instructions". Information presentation instructions are not the same as a presentation definition identification. According to paragraph 0032 of Wilkinson, information presentation instructions "provide instructions to a 'touch point' (e.g., website, call center, email, phone system, a graphical user interface, etc.) for presenting information in accordance with an interaction motivation plan". In contrast, a presentation definition identification as recited in amended Claim 17 is used to identify a presentation definition.

Eighth, the selections from Wilkinson cited by the Examiner do not teach "wherein said means to generate applies said data mining model <u>and said one or more rules</u> to said customer attribute to produce an outcome for display in said presentation according to a format included in said presentation definition" as recited in previous Claim 17. Rather, paragraph 0039 of Wilkinson teaches an "interaction motivation plan" or model having instructions for developing an "information presentation". That is, in Wilkinson, the presentation is directly generated by a model. In contrast, in amended Claim 17, a data mining model (which is referenced by a presentation definition) and one or more rules are used to generate an outcome that is then displayed in a presentation according to a format included in the presentation definition. The presentation definition is not generated by the model (as is the case in Wilkinson). Rather, the presentation definition is selected by the presentation definition identification. Importantly, the presentation definition of amended Claim 17 includes <u>a reference to the data mining model</u> and <u>the one or more rules</u>.

For the above reasons, the Applicant believes that amended Claim 17 is patentable over Thearling and Wilkinson as these references do not teach or suggest the subject matter of amended Claim 17. In particular, Thearling and Wilkinson do not teach or suggest those elements of amended Claim 17 that recite: "a repository to store said...presentation definitions"; "means to edit...said presentation definitions..."; "means to generate a presentation to deliver to a customer system"; "wherein said means to generate selects a presentation definition using said presentation definition identification and selects a customer attribute using said customer identification"; "wherein said presentation definition includes a reference to a data mining model and one or more rules"; and, "wherein said means to generate applies said data mining model and said one or more rules to said customer attribute to produce an outcome for display in said presentation according to a format included in said presentation definition".

In addition, the Applicant believes that Claims 18-23, 25-28, 30-34, and 36, being dependent on amended Claim 17, and introducing additional patentable features thereto, are also patentable over Thearling and Wilkinson.

For reasons similar to those given above with respect to amended Claim 17, the Applicant believes that Claim 37 is patentable. In addition, the Applicant believes that Claims 38-48, being dependent on Claim 37, and introducing additional patentable features thereto, are also patentable.

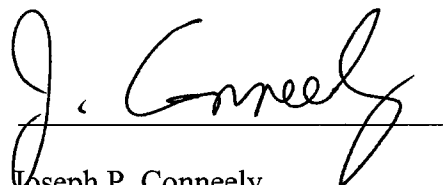No new matter has been entered by the above amendments.

The Applicant respectfully requests that a timely Notice of Allowance be issued in this case.

Respectfully submitted,

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